

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TEYO JOHNSON,	:
	:
Plaintiff,	:
	:
-against-	: Case No. 1:22-cv-06669(PAE)(GWG)
	:
EVERYREALM INC.,	:
JULIA SCHWARTZ in her individual and	: DEFENDANTS EVERYREALM
professional capacities, WILLIAM KERR in his	: INC., JULIA SCHWARTZ,
individual and professional capacities, and	: WILLIAM KERR, AND JANINE
JANINE YORIO in her individual and	: YORIO’S NOTICE OF RULE 11
professional capacities.	: MOTION FOR SANCTIONS
	: AGAINST PLAINTIFF TEYO
	: JOHNSON AND SEPPINNI, LLP
Defendants.	:
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PLEASE TAKE NOTICE THAT Defendants Everyrealm Inc. (f/k/a Republic Realm Inc.), Julia Schwartz, William Kerr, and Janine Yorrio (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Teyo Johnson’s (“Plaintiff”) Second Amended Complaint; and the Everyrealm Defendants’ Memorandum of Law; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Federal Rule of Civil Procedure (“FRCP”) 11 dismissing Plaintiff’s Complaint as to his claim for sexual harassment and issuing monetary sanctions against Plaintiff and his Counsel, Seppinni LLP.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Rule 6.1(b) of the United States District Court for the Southern District of New York, any opposing declarations or answering memoranda must be served on or before February 28, 2023, and reply declarations and memoranda must be served on or before March 7, 2023.

Dated: New York, New York
February 14, 2023

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

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Realm Inc.), Julia Schwartz, William Kerr,
and Janine Yorio*